

20 August 2015

Ms Mary Garland  
Team Leader, Roads (Metro)  
Infrastructure Projects  
Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001

Our Ref: 2015/241433

Your Ref: SSI-6622

**Attention: Mr Justin Woodhouse – Planning Officer, Roads (Metro)**

Dear Ms Garland,

**Submission on the Stage 2 EIS for the Northern Beaches Hospital Road Connectivity & Enhancement Works (SSI-6622)**


I refer to your correspondence (dated 17 July 2015) regarding the exhibition of the Stage 2 EIS for the Northern Beaches Hospital Road Connectivity & Enhancement Works (SSI-6622).

Council staff have undertaken a review of the relevant documentation and Council's submission is attached for your consideration.

In addition to the attached comments, which relate primarily to environmental and traffic matters, Council would also like to raise concerns in relation to the existing dwellings in the Bantry Bay Road sub precinct. Those that back onto the road reserve, will be able to have first floor additions under the complying development provisions of the Codes SEPP. This will result in dwellings that are greater in height than the proposed noise barriers and the Codes SEPP does not make any provision for certifiers to impose construction conditions to address noise eg. double glazing. Council would like to see this matter addressed.

If there are any questions, or you need clarification on any issues, please do not hesitate to contact Phil Jemison, Principal Planner on (02) 9942 2170.

Yours faithfully



Malcolm Ryan  
**Deputy General Manager Environment**



## Traffic

Item	Warringah Council Remarks
Forest Way/Warringah Road – Left turn from Forest Way (eastbound)	Shown as two lanes across marked pedestrian crossing. Current RMS Technical Directions do not allow two travel lanes at a pedestrian crossing. Section 5.1.3 of the EIS indicates that this will be retained as an uncontrolled left turn slip lane.
	Providing a single lane would enable left turning traffic to enter Warringah Road without the need to merge. This would reduce conflict with eastbound through traffic on Warringah Road. This would also allow the retention of the marked pedestrian crossing across the slip lane.
Warringah Road – Noise wall on southern side	There are two existing pedestrian connections from Karingal Avenue to Warringah Road pathway at the present time (adjacent to House Numbers 20 & 60). These need to be maintained with access through the noise barrier at these locations.
Warringah Road – Shared Paths, it is proposed to provide a shared path on the southern side of Warringah Road only between Allambie Road and Wakehurst Parkway.	<p>Council reiterates its desire for a shared path to be provided on the northern side of Warringah Road through this section.</p> <p>Council previously raised that it is considered that a link should be provided on Rodborough Road between the Allambie Road roundabout and the proposed pathway along the southern side of Warringah Road, and on the western side of Allambie Road, north of Aquatic Drive. RMS previous response has been that this would be considered in Stage 2. RMS should consider this link.</p>



Item	Warringah Council Remarks
Forest Way – Bus Stop	<p>The increase in size of this bus stop should also take in to account the potential future increases in bus services. The proposed increase to two buses may not cater for the future bus services given the number of routes/services that are proposed to operate via Frenchs Forest Road/Naree Road to this stop, in addition to the services operating directly along Forest Way from the Belrose area. The overflow of buses from the bus bay will cause traffic congestion on Forest Way.</p>
Warringah Road – Bus Stops	<p>While it is acknowledged that Frenchs Forest Road will provide for the majority of bus services through this area, there is still the need to provide for those services that will travel along Warringah Road and to also minimise the potential for traffic congestion as a result of buses stopping to pick up or set down.</p> <p>It is considered that indented bus bays should be provided near the intersection of Warringah Road/Hilmer Street/NBH entry and all of the bus stops on Warringah Road through the project area. This would enable buses to pull in clear of the through traffic movements prior to the installation of 'Bus Lanes' in the future as part of the express connections to Sydney/North Sydney/Chatswood.</p> <p>Council reiterates that the provision of a high frequency bus service along Warringah Road between Dee Why and Chatswood is a key component of providing good transport links to the NBH.</p>



Item	Warringah Council Remarks
<p>Intersection operation:</p> <ul style="list-style-type: none"><li>• Allambie Road/Aquatic Drive</li><li>• Forest Way/Adams Road</li><li>• Warringah Road/Government Road</li><li>• Warringah Road/Currie Road/Brown Street</li></ul>	<p>Each of these intersections is highlighted that the intersection Level of Service will be 'E' or 'F' (Table 6.5 &amp; Sect. 6.6) as early as 2018. All of these intersections provide access into the NBH/Warringah Road precinct.</p> <p>There is concern that congestion at these intersections will lead to drivers diverting on to the local road network to avoid this congestion.</p> <p>RMS should carry out any assessment of these intersections to identify future improvement options.</p> <p>The Forest Way/Adams Road intersection has been highlighted previously with regard to the intersection performance and crash history. A review of the latest available five year crash statistics highlights that the intersection has had: 9 rear end crashes involving northbound vehicles (3 injuries), 7 right through crashes (4 injuries), 1 right rear crash (1 injury) and 1 sideswipe crash (1 injury). This crash record would appear to be a direct result of the lack of a right turn bay and right turn phase for this intersection.</p>
<p>Wakehurst Parkway/Aquatic Drive (sect. 6.7.4). The opening of this intersection to allow left in/left out and right in traffic movements will increase the volume of traffic using Aquatic Drive.</p>	<p>This increased traffic may create access problems for vehicles entering or exiting Madison Way due to the restricted sight distance for westbound vehicles in Aquatic Drive on the approach to Madison Way and for vehicles exiting Madison Way. There is the potential for increased vehicle crashes occurring at this location with the opening of Aquatic Drive. The vertical alignment of the crest in Aquatic Drive at Madison Way should be reviewed and the provision of appropriate traffic management devices to reduce the risk of vehicle crashes.</p>




Item	Warringah Council Remarks
Warringah Road/Maxwell Parade	The Traffic Assessment indicates that left turns for vehicles exiting the slot on Warringah Road would not be permitted due to the potential traffic conflicts. It is not outlined how this would be achieved and the residents have not been able to see the proposal clearly. This is a concern for the residents due to their reduced access.
Allambie Road – It is proposed to prevent vehicles turning right from Allambie Road into the driveway of the commercial development at the south eastern corner of the Warringah Road/Allambie Road intersection.	It is not proposed how this is to be achieved. Warringah Council agrees that this movement is unsafe and causes congestion at the intersection however, it is considered that a physical barrier may be required. This would need to be incorporated in to the proposed road layout through this section and further reviewed as there may be an impact on the footpath area.
Allambie Road site compound (p. 98)	The diagram on this page identifies potential access from the site compound directly on to the Allambie Road/Aquatic Drive roundabout. This is not considered suitable. Entry and exit to the compound should be removed from this roundabout.
Construction Vehicle Access Routes (sect. 7.5) - Frenchs Forest Road (east) & Allambie Road	The tables on pages 107-110 indicate that there will be increased heavy vehicle movements along these roads as part of the access routes to and from the site compounds. Pavement conditions will be required to be carefully monitored during the Stage 2 works as these roads will also see increased general traffic movements during this work.
Forest Way – Pedestrian Crossing at Forestway Shopping Centre	Council reiterates that the provision of a pedestrian bridge at this location would improve pedestrian safety and traffic flows along this section of Forest Way.



Item	Warringah Council Remarks
Bus shelters	<p>Any proposed changes to bus stops will require the removal or relocation of existing bus shelters. The removal of any advertising shelters represents a financial and maintenance impact for Council that needs to be addressed. Any new shelters proposed, and to be constructed as part of the Stage 2 works, should comply with council's design requirements and disability standards for accessible public transport. Any cost implications of changes to bus shelters will need to be borne by Roads and Maritime.</p>
Road construction and potential rat runs	<p>While there will likely be impacts on the wider regional network during the construction phases it should be acknowledged that there will be impacts on the local road network within the proximity of the proposals.</p> <p>Oxford Falls Road, Morgan Road, Government Road will all be likely to incur additional traffic volumes as a result of the works being undertaken. Grace Avenue is also likely to see increased traffic volumes.</p> <p>This should incorporate regular meetings with Council Engineering staff in the planning and during the construction phase. There should also be a governance structure to consider the impact on surrounding streets if motorists choose to avoid the construction areas. This body should be able to consider and propose measures to minimise the impact on the surrounding streets. Cost of any mitigating measures such as roundabouts or slowing devices etc should be borne by RMS.</p>
Pedestrian Bridges (Figure 5-1 & 5-2)	<p>It has been highlighted to Council that while the proposed pedestrian bridges provide ramps to enable disabled access there does not appear to be any provision for stairs. Will stair access also be provided for the proposed bridges?</p>



Item	Warringah Council Remarks
Rabbett Street – Shared Path (Figure 5-1, p. 53)	The map of the proposed Work shows the shared path on Forest Way continuing across the intersection with Rabbett Street, which indicates that Rabbett Street would be closed. It is understood that Rabbett Street is not proposed to be closed so the map needs to be modified to show this.
Noise barriers (section 5.1.10)	Given the expected height of the proposed noise barriers, Council supports the use of noise barriers that are designed to a high level of quality and appearance.
Street Lighting (Section 5.1.10)	Street lighting of the slot and the realigned Warringah Road surface road is to be provided to a high standard and in accordance with Australian Standards. While RMS may meet the installation costs, there will be an ongoing increased cost to Council in electricity charges for the operation of the street lighting as a result of these works. RMS should supplement the RMS Street Lighting Subsidy payments to cover these increased levels required as a result of this work. The increases should not be a burden for Warringah ratepayers.
Maintenance of Infrastructure	The items listed above (Noise Barriers, Retaining Walls & Street Lighting) will potentially impose additional costs and maintenance implications on Council. It is considered that RMS should include a program of management for the additional ongoing cost and maintenance of infrastructure provided as part of this work. It is also considered that RMS should undertake the maintenance of this additional infrastructure.
Graffiti Management	RMS also needs to indicate how graffiti management is to be carried out on the noise walls and the retaining walls.

Item	Warringah Council Remarks
Warringah Rd at Rodborough Rd	<p>The proposed linemarking allows the Left Turn into Rodborough Rd from Warringah Rd however, this is currently a banned movement as shown in the photo below.</p> 
Warringah Rd Eastbound	<p>The plans indicate that, at the Eastern end of the slot, the merging of five traffic lanes (the three surface lanes and the two 'slot' lanes) which could be dangerous as there will be multiple manoeuvres occurring with traffic emerging from the slot potentially wanting to turn left at Allambie Road and surface traffic wanting to turn right at Allambie Road.</p>
Way Finding	<p>A comprehensive wayfinding strategy is required in consultation with Warringah Council. This needs to consider motorists, cyclists, and pedestrians.</p>





## **Stormwater**

It is proposed to construct two onsite stormwater detention systems to cater for the increased peak stormwater discharge rates. It is expected that this will affect Council's stormwater drainage system downstream of the site.

Therefore the following items will need to be taken into consideration;

- The two proposed onsite stormwater detention systems and the drainage networks draining to the onsite stormwater detention system must be maintained by Roads and Maritime Services.
- The discharge rates from the two proposed onsite stormwater detention systems to council's receiving stormwater system must be managed with respect to the existing hydraulic capacity of the network, and controlled to minimise scouring
- This may require the augmentation of council's stormwater drainage system downstream of the onsite stormwater detention systems.
- Surcharge provisions for the onsite stormwater detention system located at the Fitzpatrick Ave/Warringah road intersection must be safely conveyed through downstream private properties. This must be addressed in the stormwater drainage design, and appropriate easements created.
- The open channel upstream of the proposed detention basin between headwalls V4 and X1 on drawing DS2014/005534 sheet 064 by Mott MacDonald is to be designed to ensure all flows up to and including the 1 in 100 year ARI flow is contained within the channel. Alternatively piping of this section should be considered subject to environmental constraints.

## **Riparian**

### Riparian and Water Detention

The following commentary is provided regarding the proposal for an open detention basin and alternative location for an underground tank adjacent to Aquatic Drive. This proposal is inconsistent with the EIS, which describes a storage tank below Aquatic Drive at the intersection with Wakehurst Parkway.

Appendix H – Stormwater Design Plans prepared by Mott MacDonald drawing number MMD-342843-C-DR-RD0800-XX-011, Rev D, Sheet 064 (Appendix M of the EIS – Groundwater Assessment July 2015) shows a preliminary design for an open detention basin and alternative location within the existing creek to the north of Aquatic Drive.

The EIS (including Appendix E - Biodiversity Assessment Report and Bio banking Assessment Report) does not assess these options; therefore these options should be omitted from proposal at this stage. Should this option be progressed in the future, the EIS must be re-drafted to include all potential impacts associated with this action as the mitigation measures are likely to significantly change as a result. This may require re-exhibition of the amended EIS. Council requires clarification on the location, design and ongoing asset management arrangements for this system.



Council does not support these options as it will likely result in the complete destruction of the creek, Red-crowned Toadlet habitat and increase the already significant impacts on the Duffys Forest EEC in that area. These impacts have do not appear to have been considered in the mapping or calculations in the Biodiversity Assessment Report and Bio banking Assessment Report. The Biodiversity impact assessment for Red-crowned Toadlet is based on impacts to 0.7ha of habitat being impacted; however, the plans including a detention basin in the vicinity of Aquatic Drive would appear to impact a substantially greater area. The EIS is considered deficient in this regard.

#### Hydrology, water quality and flooding

##### Environmental Management Measures

Table 21.1 (pg. 434, Chpt. 21) does not fully describe, with any level of detail, the proposed water quality mitigation measures including type, size and location and effectiveness of any treatment measures required. Furthermore, there has not been adequate consideration of groundwater quality. The EIS states that further details are expected to be refined during detailed design stage. Council requests to be engaged throughout this detailed design process. Based on the information provided, it is not possible to determine if the impacts are satisfactorily or feasibly addressed. In addition, Council requires clarification of the ongoing asset management arrangements for this system.

The EIS is considered deficient in this regard.

#### Site Discharge Criteria

Reference is made to ANZECC freshwater criteria for the discharge of both groundwater and surface water prior to the discharge to receiving waters (pg. 19 Appendix L – Surface Water Assessment). The Surface Water Quality Monitoring Program (SMEC, August 2015), reinforces these objectives and allocates more stringent water quality objectives to Curl Curl Creek catchment given its ecological value and the presence of Red-Crowned Toadlet and Duffy Forest EEC in this area. Council agrees with this approach.

However the EIS notes a 13% simulated increase in nitrogen at 6.01 and up-gradient to 6.06 to Curl Curl Creek (pg.348, Chpt. 16, Vol. 1 & Appendix L – Surface Water Assessment). Assessment must be made as to whether to this falls outside of the adopted water quality objectives of TN - 0.250, Nox - 0.030 and NH<sub>4</sub><sup>+</sup> - 0.010. In addition, there has not been adequate consideration of groundwater inputs.

Furthermore, assessment is required to determine the extent of impacts on increased nutrients on the Duffy Forest Ecological Community (e.g. increased weed invasion) to the north and south of Aquatic Drive.

The EIS does not make any reference to the Surface Water Quality Monitoring Program (SMEC, August 2015). The Surface Water Quality Monitoring Program must be included as an Appendix in future iterations of the EIS and as such incorporated in the detailed design process.

Emergency Spill Response Procedure Council requests to be included in the development of an Emergency Spill Response Procedure to ensure risks to Council's natural assets are minimised and relevant Agency response roles are clarified and agreed to.



### Preparation of Groundwater and Dewatering Plan

The EIS states that consultation with the EPA and NOW is required for the development of this plan. Council requests to be included in this consultation due to the potential impacts on Council's natural assets.

### **Biodiversity**

The Biodiversity Assessment Report (see page 61) states: *"While a modelled reduction in groundwater flows of an unlined slot is unlikely to affect Red-crowned Toadlet habitat, should an unlined slot be preferred during detailed design further consideration of groundwater seepage management would nevertheless be required. In particular, further assessment of the potential for groundwater seepage to adversely impact surface water quality thereby potentially affecting Red-crowned Toadlet habitat."* The EIS documentation states that the slot will be unlined. It is therefore assumed that further assessment of the Red-crowned Toadlet in relation to water quality, is pending.

### Potential need for Re-alignment of Electricity Easement – Aquatic Drive

The south side of Aquatic Drive includes an electricity easement which is very close to the alignment of the widening in this area. Such easements require ongoing clearing of native vegetation to maintain safety clearances. Where the proposed road network enhancements in this area result in the re-alignment of electricity infrastructure into the adjoining native vegetation, the extent of clearing should be accounted for in the current Biodiversity Assessment Report.



## Comments on Appendix I – Non-Aboriginal Heritage

Comments were made as part of the Consistency Review of this document, which related mainly to the correction of factual information.

A review of the Final document, as exhibited, has revealed that a number of these corrections have not been incorporated into the final document. Those matters not addressed as previously, are highlighted below in blue font.

- It is not titled *Appendix I – Non-Aboriginal Heritage*;
- Recommendation 1 (page 2). It is considered that this recommendation should cover relocation and propagation at the same time, rather than seeing if relocation will work, then trying to propagate when the tree is in a weakened state from relocation. In fact, propagation should happen first before any relocation is undertaken. Propagated trees can still be incorporated into the NBH grounds or added to the existing grove;
- Page 3 – needs updating once NBH Stage 2 approval is given;
- Page 7 – no *Figure 1 – 1 Study area*;
- Page 19 – no *Figure 2.1*;
- Page 25 – *Integrity and Intactness* – this information is out of date as the heritage item was updated upon the gazettal of Amendment 6 to WLEP 2011 on 30 May 2014;
- Page 26 – *Table 5 - 1 Heritage items within the study area* – this is inconsistent with the Statement in *Section 2.2.5 Local heritage* which states that “A search of Schedule 5.....identified no local heritage items within the study area”;
- Page 34 – No Figure 6 – 4; NOTE: the Figure has been included but is incorrectly labelled Figure 6 – 1 (which already exists on page 29);
- Page 35 – Table at bottom of page repeats information about the Former Brick Pit, rather than Holland’s Orchard;
- Appendix 1 – not included;
- Appendix 2 – Inventory Sheet is from OEH, but is out of date. Council can provide a more up-to-date inventory sheet